

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA
v.
SANTIAGO ET AL.

**DEFENDANT JOSE TORRADO'S MOTION TO MODIFY THE
CONDITIONS OF RELEASE**

Now comes the defendant, JOSE TORRADO and moves this honorable Court to modify his conditions to terminate the electronic monitoring and replace it with a personal visit once a week to probation and a telephone call once a week. Mr. Torrado has been completely compliant with all conditions of his pretrial release, for more than one year, including seeking and maintaining employment. If he is released from the bracelet, he will be able to be a more active parent with his children. The defendant suggests that the bracelet be replaced by two contacts each week with the Pretrial Services Unit, once by telephone and once in person.

WHEREFORE : The defendant prays that this Court grant the modification.

Respectfully submitted,

JOSE TORRADO

By his attorney,

-
/s/Lenore Glaser, Esq.
Lenore Glaser, Esq.
25 Kingston Street, 6th Floor
Boston, MA 02111
(617) 753-9988
BBO #: 194220

Dated: November 9, 2005